



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

November 29, 2010

John Goll, Regional Director  
Bureau of Ocean Energy Management, Regulation and Enforcement  
3801 Centerpoint Drive, Suite 500  
Anchorage, Alaska 99503-5820

Re: U.S. Environmental Protection Agency (EPA) Comments on the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) Draft Supplemental Environmental Impact Statement (EIS) for Chukchi Sea Lease Sale 193, EPA Project # 05-049-MMS

Dear Mr. Goll:

We have reviewed BOEMRE's Draft Supplemental EIS for Chukchi Sea Lease Sale 193. Our review of the EIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our Section 309 authority, our review of the EIS considers the expected environmental impacts as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

EPA recognizes that the limited scope of the EIS (evaluation of natural gas development and production, and missing or incomplete information and cost) is in response to the U.S. District Court, District of Alaska order. This order directed BOEMRE to address these deficiencies identified in the initial EIS.

We believe that BOEMRE has produced a succinct document that clearly addresses these deficiencies. We are particularly pleased with the methodical and understandable analysis of incomplete or missing information in Appendix A. We also believe the process employed by your agency fully meets the intent of the Council of Environmental Quality's requirements for such situations. Additionally, the analysis of potential impacts from possible gas exploration, development and production is quite thorough, with clear indication of relatively minor impacts (with the potential exception of unknown archeological resources) from such activities.

Based on our review and, in part due to the limited scope of the analysis, we have assigned a rating of LO (Lack of Objection) to this EIS. A summary of our rating system is enclosed.

If you have any questions concerning our rating, please contact Jennifer Curtis of my staff in Anchorage at 907-271-6324 or by email at [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov). Thank you for the opportunity to review this EIS.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure



**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.